



888 SEVENTH AVE.
SUITE 304
NEW YORK, NY 10106
www.bursor.com

FREDERICK J. KLORCZYK III
Tel: 646.837.7150
Fax: 212.989.9163
fklorczyk@bursor.com

February 1, 2021

By ECF:

The Honorable Ronnie Abrams
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Moses v. The New York Times Company*, Case No. 1:20-cv-04658-RA (S.D.N.Y.)

Dear Judge Abrams:

The undersigned represent Plaintiff Maribel Moses and Defendant The New York Times Company (collectively, the "Parties") in the above-referenced matter. We write pursuant to the Court's January 19, 2021 Order, instructing that "[n]o later than February 1, 2021, the parties shall file a letter updating the Court on the status of settlement negotiations." ECF No. 35.

The Parties are working promptly to finalize the class action settlement agreement and exhibits thereto. Plaintiff expects to move for preliminary approval on or before March 15, 2021.

Very truly yours,

/s/ Frederick J. Klorczyk III
Frederick J. Klorczyk III, Plaintiff's Counsel

/s/ Kristen C. Rodriguez
Kristen C. Rodriguez, Defendant's Counsel

CC: All counsel of record (via ECF)